

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| SECURITIES AND EXCHANGE | : | |
| COMMISSION, | : | |
| | : | |
| Plaintiff, | : | 19 Civ. 09439 (PKC) |
| | : | |
| v. | : | ECF Case |
| | : | |
| TELEGRAM GROUP INC. and TON | : | |
| ISSUER INC., | : | |
| | : | |
| Defendant. | : | |
| ----- | X | |

MOTION TO PROCEED UNDER PSEUDONYM

PLEASE TAKE NOTICE THAT, non-party “Investor E,” by and through its attorneys, hereby moves for permission to proceed under pseudonym and to omit its name and address from the docket.

The grounds for this motion are set forth in the accompanying memorandum of law. As the memorandum explains in detail, Investor E is a non-party to this litigation, and appears solely for the purposes of securing an order from this Court on its motion to seal. The documents that are the subject of Investor E’s motion to seal contain the identity of Investor E, a firm that purchased defendants’ digital currency, called “Grams”; the identity of Investor E’s business personnel; and certain other information that would reveal the identity of Investor E. Given the limited nature of Investor E’s appearance, the immateriality of the identity of Investor E to this matter, and the fact that public disclosure of Investor E’s identity would defeat the nature of the relief Investor E seeks from the Court, this Court should permit Investor E to proceed by pseudonym. A proposed order is attached.

Dated: February 4, 2020

Respectfully submitted,

S/ Charles A. Brown

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